

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

THIS DOCUMENT RELATES TO:

*Evon Smalls v. Zhejiang Huahai
Pharmaceutical Co. Ltd., et al.,*

Case No. 1:20-cv-08199-RMB-SAK

MDL No. 2875

Honorable Renée Marie Bumb
District Court Judge

**AMENDED NOTICE OF SECOND VIDEOTAPED
DEPOSITION OF PLAINTIFF EVON SMALLS**

PLEASE TAKE NOTICE that, in accordance with Rule 30 of the Federal Rules of Civil Procedure, the Fact Witness Deposition Protocol in this case (Case Management Order #20, filed November 17, 2020 – ECF No. 632), and the Case Management Schedule for the Second Wave of Potential Personal Injury Bellwether Plaintiff Trials (filed March 12, 2025 – ECF No. 2988), Defendants Zhejiang Huahai Pharmaceutical Co., Ltd., Huahai US, Inc., Solco Healthcare U.S., LLC, and Princeton Pharmaceutical Inc. will take the deposition upon oral examination of Evon Smalls, on **May 9, 2025, beginning at 10:00 a.m. EDT**, and continuing until completion, at:

Charleston Place Hotel
205 Meeting Street
Charleston, SC 29401

Counsel who wish to attend remotely will have the option to do so using audio-visual conference technology and should notify the attorney contact for the 2 deposition listed below to arrange for login credentials to be sent to them prior to the deposition. The deposition shall be videotaped and recorded stenographically and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case. The attorney contact for the deposition is:

Nina R. Rose
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Dated: May 5, 2025

Respectfully submitted,

/s/ Nina R. Rose
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*Attorney for Defendants Zhejiang Huahai
Pharmaceutical Co., Ltd., Huahai US, Inc.,
Solco Healthcare U.S., LLC, and Princeton
Pharmaceutical Inc.*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 5, 2025, a true and correct copy of the foregoing Amended Notice of Second Videotaped Deposition of Plaintiff Evon Smalls was served upon the below counsel of record by e-mail:

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Attorney for Plaintiff Evon Smalls

Dated: May 5, 2025

Respectfully submitted,

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